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May 28, 1999

Mr. Thomas Ferns
U. S. Dept. of Energy
Richland Operations Office
P.O. Box 550, MSIN HO-12
Richland, WA 99352

Re: The Hanford Remedial Draft Environmental Impact Statement

Dear Mr. Ferns:

American Rivers is a national, not-for-profit membership organization with its main office in Washington, D.C., and regional offices in Seattle, Washington, and Phoenix, Arizona. American Rivers is the nation's leading river conservation organization. We are striving to secure a future in which healthy rivers support diverse species of wildlife, fish and plants, are safe for human consumption and recreation, contribute to sustainable local economies, and improve the quality of life for all Americans. The Northwest office fulfills this mission by working to protect and restore river ecosystems that will support thriving wild salmon runs in Washington, Oregon, and Idaho. Hence our interest in the HRA-EIS and in the preservation of the Hanford Reach and its associated ecosystem. In 1998, American Rivers designated the Hanford Reach as the nation's most endangered river, principally because of legislation proposed by Congressman Hastings that would allow the fragile lands of the North Slope to be returned to local control and opened for irrigation.

We appreciate the opportunity to comment on the Hanford Remedial Action Environmental Impact Statement and Comprehensive Land use Plan (HRA-EIS). We are pleased the U. S. Department of Energy (DOE) has recognized the irreplaceable ecological values of the Wahluke Slope and the Hanford Reach of the Columbia River in its preferred alternative. The Hanford Reach ecosystem, including the Hanford Reservation, contains the best of what remains of the shrub-steppe ecosystem that once blanketed eastern Washington. Large blocks of intact habitat support hundreds of diverse native plants and animals--dozens of them now rare. The Hanford Reach, the last free-flowing segment of the Columbia River in the U.S., provides a migration corridor and critical spawning and rearing habitat for fall Chinook salmon and numerous other native fish. Because much of the similar habitat surrounding Hanford has been converted to agriculture or degraded by other uses, the Hanford Reach and adjacent, uncontaminated DOE lands represent an irreplaceable natural legacy and a truly national treasure. These lands should be immediately and permanently protected.

NORTHWEST REGIONAL OFFICE
150 NICKERSON STREET
SUITE 311
SEATTLE, WA 98109
206-213-0330
206-213-0334 (FAX)
arnw@amrivers.org (INTERNET)

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We support the DOE preferred alternative, but with the following modifications:

PROTECT THE "CRESCENT" OF HABITATS AS A NATIONAL WILDLIFE REFUGE

The following adjoined DOE lands should be managed as a permanent National Wildlife Refuge: the Arid Lands Ecology Reserve, the McGee Ranch, the Riverland area, all DOE land on the entire Wahluke Slope, the Hanford Reach, and the Columbia River islands. This will provide a much-needed large, continuous "crescent" of protected land surrounding central Hanford.

We understand that under contract to the DOE, the Nature Conservancy has conducted a biological survey of Hanford finding over twenty rare species of plants and insects some of them new to science. The McGee ranch provides an invaluable wildlife connection to the Umpqua Ridge and on to the Cascade Range. U.S. Geological Survey, Bureau of Reclamation and Washington State University studies have shown that farming the Wahluke Slope would jeopardize the White Bluffs, which border the Hanford Reach, by causing landslides into salmon spawning sites. That is the last thing we need with salmon and steelhead listed as endangered and threatened throughout the Columbia Basin. Scientists are in perfect agreement that we must preserve the core Hanford Reach habitat in order to have any hope of recovering the listed stocks.

EXPEDITE PROTECTION

The areas mentioned above are prime fish and wildlife habitat, uncontaminated by Hanford operations, and should not wait for protection until the complex decisions involving clean-up in the central Hanford area are made. To expedite a final decision on management of uncontaminated lands, DOE should issue a separate Record of Decision (ROD) for the areas mentioned above. The ALE and Wahluke Slope are already managed as wildlife refuges while the McGee Ranch makes the connection between the two providing a contiguous wildlife refuge in one of the last, large tracts of shrub-steppe habitat in Washington State. Wildlife Refuge designation for the Wahluke Slope and Wild & Scenic River designation for the Hanford Reach has been recommended in the Hanford Reach Final EIS, June, 1994 and its associated Record of Decision.

We urge their immediate transfer to the U.S. Fish and Wildlife Service in perpetuity for management as a National Wildlife Refuge.

REPLACE INDUSTRIAL USE AREAS WITH COMBINED INDUSTRIAL USE AREAS REFLECTED IN THE RECOMMENDATIONS FROM ALTERNATIVES ONE AND TWO

The industrial-exclusive areas (200 Areas) should reflect alternative one and two boundaries (western extension of preferred alternative is not necessary for Hanford Operations). The combined Industrial areas described in alternative one and two provide over 6,200 acres of public land for industrial expansion in addition to the 11,350 acres for Industrial-Exclusive use of the 200 Areas. This Industrial use designation includes all areas defined by the City of Richland in their Comprehensive Plan and provides more than ample space for local economic development, especially considering the acreage available off the Hanford Site currently planned for development. Industrial use should be restricted to locations contiguous with currently developed areas in the southeast portion of the Hanford Site where utilities are available and land disturbance is greatest. No industrial use should occur in sensitive wildlife habitats or further fragment these habitats.

NO AGRICULTURE, GRAZING OR COMMERCIAL MINING

To ensure long-term protection for key native species and systems located across the Site (including central Hanford), there should be no agriculture, commercial mining, or livestock grazing permitted. High intensity recreation should also be limited to development of a museum at the B-Reactor. High Intensity Recreation would allow development of destination resorts, golf courses and commercial facilities, which would destroy the character of the Site.

PROTECT ALL OTHER IMPORTANT LANDS AT HANFORD

The Hanford Site is one of the last places in eastern Washington supporting large areas of native shrub-steppe vegetation and related wildlife. We urge DOE permanently to protect the ecologically significant lands at Hanford, including those in central Hanford, such as Gable Mountain, Gable Butte, Hanford Sand Dunes, Vernal Pools, and other important habitats.

RESTRICT DESIGNATED RECREATIONAL AREAS

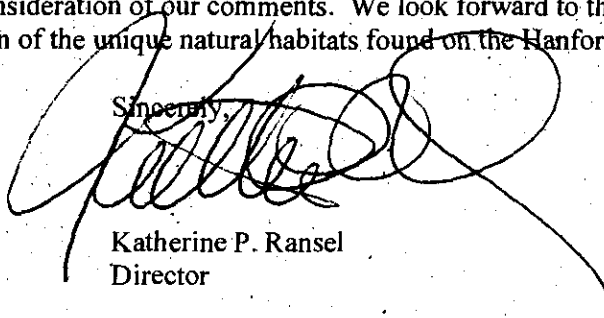
Developed recreational areas should be restricted to one low intensity recreation area at the Vernita Rest Stop (an improved boat ramp in conjunction with the existing rest stop thereby reducing riparian area disturbance and utilizing existing developed resources, *i.e.*, the facilities at Vernita). High intensity recreation should occur only at the B-Reactor which should be a museum. Access to B-Reactor must be by existing roads only (avoiding disturbance to important riparian habitat along the river). We are not opposed to low impact recreational use of the Hanford Reach and surrounding public lands, but recognize that developed recreation can have adverse environmental impacts similar to industrial use. No commercial development should be allowed in these low-intensity recreation areas.

**DESIGNATE ALL OTHER AREAS CONSERVATION/MINING (WITHOUT GRAZING) AND
LIMIT MINING TO AREAS NECESSARY FOR CLEANUP**

Indeed, designating much of central Hanford lands as Conservation/Mining without grazing should occur only where immediate preservation as wildlife refuge is not feasible. The Washington State Department of Fish & Wildlife has identified substantial portions of central Hanford as priority habitat. The object of Conservation/Mining is to provide the USDOE mineral resources to complete cleanup activities while protecting valuable wildlife habitat. Therefore, mining should be restricted to only those activities supporting Hanford's cleanup mission and any areas not needed for mineral resources should be designated preservation. Grazing, or any agriculture, should not be allowed on any Hanford lands because grazing increases fire danger and spreads noxious weeds. Agricultural use of Hanford lands would put Washington State agricultural products at risk of extremely negative publicity. Areas designated Conservation/Mining should revert to Preservation when those lands are no longer needed for Hanford clean up.

Thank you for your consideration of our comments. We look forward to the final HRA-EIS and will continue to support preservation of the unique natural habitats found on the Hanford Site.

Sincerely,



Katherine P. Ransel
Director